Before The
Federal Communications Commission
Washington, D. C. 20554

In the Matter of	
Numbering Resource Optimization	CC Docket No. 99-200

WE, THE PEOPLE OF THE STATE OF CALIFORNIA, AND BY PROXY FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION THEREIN, PETITION THE FEDERAL COMMUNICATIONS COMMISSION FOR A WAIVER TO IMPLEMENT THE FULL SET OF HEXADECIMAL DIGITS AS PHONE NUMBERS IN A NEW INDUSTRY CLASS OF SERVICE IN ALL AREA CODES WHILE STILL MAINTAINING NANP COMPLIANCE AND THAT IS ACCOMPLISHED WITHOUT ANY PARTIES INCURRING ANY COSTS

1. Summary Title

We, the people of the State of California, and by proxy for the California Public Utilities Commission therein, petition the Federal Communications Commission for a wavier to implement the full set of hexadecimal digits as phone numbers in a new Industry class of service in all area codes while still maintaining NANP compliance and that is accomplished without any parties incurring any costs.

2. WAIVER CONTENTS TABLE

3. Petition Unnecessary

Several knowledgeable people do not think any petition is required at all, but can not get the phone company to make it work without one. Many have expressed the fact that no waiver is needed from the FCC to begin implementation of hexadecimal phone numbers. Still others express doubt and will feel much better with the express consent of an FCC Order to begin implementation of the hexadecimal Industry program. The new hexadecimal program will eliminate the need for any new area codes in

the next 100 years and all without any change in the NANP format or cost to any parties involved.

4. Public Encouragement
I have had several encouraging comments from elected officials and local knowledgeable people suggesting that I go ahead with this petition on behalf of the People of the State of California and by proxy for the CPUC.

To that end, using a solar powered Macintosh with wireless internet connection from sea to shining sea, we electronically file this document with the Federal Communications Commission this July 4th Independence Day 2003.

5. Formal Petition
The People of the State of California (People), and California Public Utilities Commission (CPUC by proxy), submit to the Federal Communications Commission (FCC) this Petition for Waiver to Implement the full set of hexadecimal digits as phone numbers and creation of the Industry Class of service in all area codes while still maintaining NANP compliance. Specifically, the CPUC/People request that the Commission grant a waver of 47 C.F.R. and others.

The People are not able to determine the precise sections most appropriate to this issue. We must request the FCC assign staff to make exact recommendations of appropriate sections so as to authorize California to implement the full set of hexadecimal digits as phone numbers and the creation of the Industry Class of service in all area codes.

The People of the State of California are making this request so that we can maximize the options available to gain control of the ongoing number crisis we face. This solution could stand for the next 100 years and is a solution that is entirely free of costs to all involved.

6. Background Information
While discussing number theory and bases with students at the university during 1980's, (at a time when a new area code split was being announced in the news), I proposed that no area code need be split if hexadecimal numbers were used as phone numbers. This observation lead to a technical investigation that culminated in a letter to the California Public Utilities Commission. Their reply made no sense! I then wrote to the Federal Communications Commission and they too replied with a response that was not logical. They stated that the writer had absolutely no knowledge of hexadecimals, the current status of the national telephone system, or of the NANP. For that matter, in all the conversations I have had, none of the contacts with the FCC have known about hexadecimals.

Subsequently, I wrote occasionally to both commissions, but neither offered any assistance. I also wrote to the Pacific Telephone Company and managed to have a conversation about the possible use of hexadecimal phone numbers. Nothing ever came of my efforts.

Necessity being the mother of invention, I again became aware of the impending split of a local area code and this time I wrote to the Governor of the State of California. He referred my letter to the CPUC and I was contacted. Also I took part in a proceeding addressing

possible issues about area codes.

I applied to and was accepted as a party in 1999 to the CPUC proceeding Rulemaking R.98-12-014, Regarding Commission Policy on Area Code Relief. This discussion forum prompted me to write the visionary Neill Plan. This new plan, a 350 page document addressing the use of hexadecimals as phone numbers, was followed by another 150 page document expanding this concept.

Simultaneously, I found that the FCC was in the midst of its own discussion on the subject. I contributed the slightly modified visionary Neill Plan to CC Docket 99-200, (In the Matter of Numbering Resource Optimization in 1999) and the expansion document shortly thereafter.

Reference is made to these published CPUC and FCC documents titled:

"COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF HEXADECIMAL PHONE NUMBERS UNDER A NEW "INDUSTRY" CLASS OF SERVICE THAT WILL ALLEVIATE THE AREA CODE ASSIGNMENT CRUNCH AND PROVIDE SUBSTANTIAL EXPANSION OF ALREADY AVAILABLE NUMBERS IN ALL LOCATIONS AND IN ALL AREA CODES AND ALL AT NO COST TO ANYONE."

Please take a moment to view both documents on internet today. The CPUC item number is 43 and the FCC item number is 70. Both are located at:

<http://www.webcom.com/electro7/hex/hex.html>

Please note that there are additional issues involving proposed Enum and the Department of Commerce.

7. Current Status
The above mentioned CPUC Rulemaking R.98-12-014 was heard by an Administrative Law Judge, who's background was in biology and he had no grasp of the Hexadecimal Solution as The Neill Plan had then become known by now, and nothing ever became of all this effort. We have attempted to get the CPUC to learn about hexadecimals, but they have no competent engineers on staff and refuse to hire consultants. Providing only a biology major to hear these issues is incompetence at its worst.

The FCC version was FORMALLY submitted to the Commission members, following strict guidelines and format requirements for Docket 99-200. Nothing has ever been revealed on the status of this promising proposal. As of today, nearly 4 years later, we have no idea where it is located or its current status. I find it odd that none at the FCC will reveal what is going on with this proposal.

8. NANP Compatibility
We seek to preserve NANP compatibility, but rogue activities of the FCC, where tacit approval and encouragement to the telephone association has lead to the development of a new proposed NANP format of (4+4+5) digit dialing has emerged. This would require at least 9 digits to dial a local call. Should this become standard, it would destroy the (3+3+4) format now used at an unnecessary cost of several billions of dollars.

9. Telephone Technology
There have been steady improvements in Telephone Technology since I originally proposed the expanded use of hexadecimal phone numbers in the

1980's, but the People have yet to benefit from this technology of using hexadecimals. The people have the right to reasonable application of technology and when that technology is already built in and even already paid for it is heresy to deny its use. Instead, we see continued meager efforts at extending the life of an area code and the exchanges therein. This is based mostly upon 1k number block assignments. This however, will not be enough to stem the tide for American communications needs. In fact, continuing in this vein will surly produce so many area codes, that we, in California will have set the record for over 100 area codes. Just to call a friend, you will need to jump 4 or 5 area codes in the same county area that was once served by a single area code and that still serves only about 2 million people. Area codes cost everybody money, but make money for the phone companies, so it is no wonder they will attempt to block the Hexadecimal Solution.

When it was introduced and proposed to become the national standard to the FCC provisions for expansion were already in existence and were in fact included in the proposal for acceptance of this new tone based system.

The problem has a very appropriate solution that was built in to it when the DTMF Touch Tone proposal was first introduced to the FCC by Bell Labs in the 1950's. Unfunded as we are the FCC staff is requested to search for and publish the original application and the authorization for charging the public for it. We have already paid for the touch tone.

Visit any library to see the diagrams and read the discussions presented about this new invention based upon 16 digits. Research the books on touch tone DTMF where you will find the notation that the 1633 Hertz frequency is reserved for future needs and expansion of the current system, decimal or dirty decimal as it were.

This proposal to the FCC (the one they can't find) by the Bell Telephone companies included all the hexadecimal digits as are represented by the secret right column of buttons representing the tone pad's High Band of 1633 Hz. This makes the tone pad a 4 x 4 pad instead of the existing 3 x 4 pad on your phone.

You may notice that I have repeatedly referred to the "expansion" of hexadecimal digits. This is because we are already using the hexA=0, and hexB=* and hexC=# currently on your dial. Thus any phone number that has a 0=hexA in it, (202/234-5678) is in fact, by definition, a hexadecimal phone number. If any part of a number uses a hexadecimal digit, then the entire number is hexadecimal. Furthermore, Nextel Communications has already commenced assignment of hexadecimal phone numbers to its phones: 1-25*/ 34*-6454, where area code 25B and prefix 34B are in use today.

Long overdue, we want the ability to use two hexadecimal digits, transmitted during the ring pause along with the Caller ID, so that we can control systems and read electric meters via the existing telephone connection using, for example, 234-6789 #F3.

10. Telephone Equipment

Nothing to change here! All current phones will work just as they do today for voice service. We strongly believe the phone is a dedicated voice instrument and that 50% of the numbers, both wireline and wireless, are dedicated to voice uses as they should be. We do advocate

all second and above lines be hexadecimal, not decimal, as they now unnecessarily use valued decimal numbers and are a significant part of the problem.

We make provisions for using 34# for FAX type numbers and 87* for pager uses, as examples, all similar numbers are dialable using the current key pad on your phone.

The other 50% of the numbers are being used by computers, modems, alarm systems, weather stations, and elevator phones, none of which the public needs to dial with a phone instrument. All are dialed by automatic equipment and should be hexadecimal phone numbers of the type 4FB-5CAF, which all automatic equipment can dial easily.

11. Industry Service Class
The creation of the Industry class of service is required. It is intended to prevent the phone company from denying service in cross locations and to provide hexadecimal service incentives such as $ 5.00 per month line service for the next 3 years.

If you want a Residential line located at your business (so you can answer your home phone while at work) they will refuse to allow the service, demanding that you must pay the Business rate.

12. Future Application
The Hexadecimal Solution takes time to produce its many advantages. The current 310/424 area code split of South Bay Los Angeles and the future 619/935 San Diego area code split could become unnecessary if the Neill Plan is implemented in a timely manner.

13. People Act In Absence of Leadership
None of us are interested in a confrontation, but there is plenty of room to point the finger. We, the people, simply want action and a reduction in the Area Code proliferation. It has been said, your either a part of the solution or a part of the problem. Which are you?

Leadership has been lacking for some time and confidence that something is being done is at a low ebb. Please place these issues before a competent forum. Consider hiring engineers not attorneys!

As a citizen of the US, I am making this petition for not only the state of California but for the entire nation, and with due respect, for Canada and other nations using the NANP system that need to get their own Country Code.

If the government agencies do not recognize the importance of this problem then, we the people, will continue to make “noise” until they realize we will not be silenced and some action is taken.

Long ago in 1980’s I proposed the use of hexadecimals and formally in July 27, 1999 to July 4, 2003, four long years ago with no action.

Nearly every day, I receive information, especially from phone company employees, that the phone company routinely discourages any innovations. Especially any innovative proposals that include the use of hexadecimals, but this will not stop the will of the people of America.

14. Conclusion
For the reasons stated above The People of the State of California, and by proxy for the California Public Utilities Commission, requests that the FCC grant this waiver.

Respectfully submitted,

PROF BILL NEILL

/s/ PROF BILL NEILL

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Dated: July 4, 2003 Wm. J. Neill, Petitioner in Propria Persona

P. O. Box 33666
San Diego, CA 92163-3666
619/ 990-5711 voice mail
619/ 236-1213 home office
Email: <billneill@yahoo.com>

Petitioner in Propria Persona as Attorney for the People of the State of California and by proxy for the

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

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